RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
					1. Black, Doug				
					2. Catalono, Anthony				
					3. Passaro, Gerard				
					4. Peattie, Kevin				
					5. Sausto, Phil				
					6. Trama, Alex				
					7. Thistle, Greg				
how					8. Justice, Jerry				
to		¶ 56 Although no one identified this			9.Ketter, Joe				
repe		as a risk to SiteOne at the time, with			10. Korsnowski, Brian				
at		the benefit of hindsight, this was			11. Francassi, Lynn				
head	All documents referencing	clearly Giordano's first attempt to			12.Hoffman, Brian				
ers	communication with and/or	steal information from SiteOne using			13.Ferrante, Anthony				
on	among SiteOne employees	an external drive plugged into			14. Koch, Taylor		repair* AND (computer		
exce	concerning the allegation in	Casper's computer (which computer			15.D'Onofrio, Jesse		OR laptop OR desktop)		10/20/2022 -
ι	¶ 56 of the Complaint.	was used for bookkeeping).	NO	N/A	16. Marx, Teresa	N/A	AND drive	N/A	present
		¶ 57 Around the same time Don							
		Caroleo left the company, Giordano							
		also began regularly making							
		comments and insinuations to the			1. Black, Doug				
		legacy Garden Department			2. Catalono, Anthony				
		employees that he would not remain			3. Passaro, Gerard				
		with SiteOne for very long after Don			4. Peattie, Kevin				
		Caroleo's departure, such as, "I			5. Sausto, Phil				
		don't know how much longer I'll be			6. Trama, Alex				
		here." (Trauma ,r 3.) Giordano also			7. Thistle, Greg				
		began speaking negatively about			8. Justice, Jerry				
		SiteOne to his fellow employees,			9.Ketter, Joe				
		doing his best to portray the			10. Korsnowski, Brian				
		company in a bad light. (Trauma ,r			11. Francassi, Lynn				
	All documents referencing	4.) Giordano told SiteOne			12.Hoffman, Brian		(Nick OR Giordano)		
	communication with and/or	employees that SiteOne would "get			13.Ferrante, Anthony		AND (Alex OR Trama)		
	among SiteOne employees	rid of" them, that the company			14. Koch, Taylor		AND (remain* OR		
	concerning the allegation in	would not pay them as promised,			15.D'Onofrio, Jesse		stay* OR leaver OR		10/19/2022 -
26	¶ 57 of the Complaint.	and other things of that nature. (ld.)	NO	N/A	16. Marx, Teresa	N/A	"get rid")	N/A	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
NO.	Ni F	AC	Search	SiteOffe Gustoularis	Froposeu Custoulans	SiteOffe Territs	Terms	nalige	Date Range
		# FOL N							
		¶ 58 In November 2022, SiteOne first							
		began suspecting Don Caroleo was							
		planning to open a competing							
		business. (Catalano ,r 8.) This							
		suspicion was based on a report			1. Black, Doug				
		SiteOne received that Don Caroleo			2. Catalono, Anthony				
		purchased a parcel of land suitable			3. Passaro, Gerard				
		for a landscaping supply operation			4. Peattie, Kevin				
		just four miles from SiteOne's			5. Sausto, Phil				
		Coram location. It has now been			6. Trama, Alex				
		determined that the property Don		1. Black, Doug	7. Thistle, Greg				
		Caroleo purchased is located at 38		2. Brisendine, Briley	8. Justice, Jerry				
		Yaphank Middle Island Road, Middle		3. Caroleo, Don	9.Ketter, Joe				
		Island, New York (the "Middle Island		4. Catalono, Anthony	10. Korsnowski, Brian	(new business or			
		Road" property). (Id.) This		5. Giordano, Nick	11. Francassi, Lynn	competing business			
	All documents referencing	information came to SiteOne by way		6. Passaro, Gerard	12.Hoffman, Brian	or new company or	(Don OR Caroleo) AND		
	communication with and/or	of a customer who informed SiteOne		7. Peattie, Kevin	13.Ferrante, Anthony	competing company)	(land OR property)		
	among SiteOne employees	that he had been outbid by Don		8. Sausto, Phil	14. Koch, Taylor	and (Don or Nick or	AND (purchase* OR		
	concerning the allegation in	Caroleo on the parcel of land in		9. Trama, Alex	15.D'Onofrio, Jesse	Nicholas or Giordano	buy* OR bought OR	1/1/2019 to	10/1/2022-
27	¶ 58 of the Complaint.	question. (ld.)	YES	10. Thistle, Greg	16. Marx, Teresa	or Caroleo)	outbid)	present	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
NO.	NFF	AC	Search	Siteone Gustoulans	Proposeu Custoulaiis	SiteOffe ferris	Territs	halige	Date halige
	All documents referencing communication with and/or	¶ 58 In November 2022, SiteOne first began suspecting Don Caroleo was planning to open a competing business. (Catalano ,r 8.) This suspicion was based on a report SiteOne received that Don Caroleo purchased a parcel of land suitable for a landscaping supply operation just four miles from SiteOne's Coram location. It has now been determined that the property Don Caroleo purchased is located at 38 Yaphank Middle Island Road, Middle Island, New York (the "Middle Island Road" property). (Id.) This information came to SiteOne by way of a customer who informed SiteOne		1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Koch, Taylor 12. D'Onofrio, Jesse 13. Marx, Teresa	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12.Hoffman, Brian 13.Ferrante, Anthony	38 Yaphank or Middle			
	among SiteOne employees	that he had been outbid by Don		14. Caroleo, Don	14. Koch, Taylor	Island Road or			
	concerning the allegation in	Caroleo on the parcel of land in		15. Giordano, Nick	15.D'Onofrio, Jesse	horseblock or horse			
27	¶ 58 of the Complaint.	question. (ld.)	YES	16. Brisendine, Briley	16. Marx, Teresa	block or narrow way 2	N/A	N/A	10/1/2022
	All documents referencing communication with and/or among SiteOne employees	¶ 59. This information was consistent with what Don Caroleo once told one of his former SiteOne co-workers. Sometime in 2022, Don Caroleo mentioned purchasing land near SiteOne's Coram, New York location and that he had decided to open a nursery business after his contract		1. Catalono, Anthony 2. Passaro, Gerard 3. Peattie, Kevin 4. Sausto, Phil 5. Trama, Alex 6. Thistle, Greg	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12.Hoffman, Brian 13.Ferrante, Anthony 14. Koch, Taylor		(Don OR Caroleo) AND (Brian OR Kersnowski) AND (land OR property		
	concerning the allegation in	with SiteOne "expired." (Kersnowski		7. D'Onofrio, Jesse	15.D'Onofrio, Jesse		OR nursery) AND	3/1/2023 -	1/1/2022 to
28	¶ 59 of the Complaint.	,r 4.)	YES	8. Marx, Theresa	16. Marx, Teresa	Don or Vic or Nick	purchas*		present

No. New Part No. New Part	RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
1 80. Don Caroleo even tolid this co- worker something to effect of, "I can even put the business in my sister's name," which the co-worker took to mean that Don Caroleo was contemplating possibly establishing a competing business in his sister's name to avoid directly violating the contractual non-compete restrictions he was subject to with Sie-One. (Id.) Don Caroleo also alluded to his former co-worker that employees at Garden Department communication with and/or of colorations since acquired from among Sie-De employees concerning the allegation in and when he left the company and started a competing business. (Id.) All documents referencing communication with and/or of a proper since and a competing business. (Id.) All documents referencing among Sie-De employees concerning the allegation in and when he left the company and started a competing business. (Id.) YES 1. Black, Doug 2. Catalono, Anthony 3. Passara, Gearad 4. Peattle, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistie, Greg 9. Justice, Jerry 9. Meter Joe 10. Korsnowski, Brian 11. Francass, Lynn 12. Hoffman, Brian 13. Ferrance, Anthony 13. Pomorio, Jesse 15. O'Choffino, Jesse 16. Marx, Theresa 18. Black, Doug 12. Catalono, Anthony 13. Passaro, Gearad 14. Peattle, Kevin 15. Black, Doug 12. Leftman, Brian 13. Ferrance, Anthony 13. Ferrance, Anthony 13. Peattle, Kevin 14. Francass, Lynn 15. O'Choffino, Jesse 15. O'Choffino, Jesse 15. O'Choffino, Jesse 15. O'Choffino, Jesse 16. Marx, Theresa 18. Black, Doug 12. Catalono, Anthony 13. Passaro, Gearad 14. Peattle, Kevin 15. Black, Doug 12. Leftman, Brian 13. Ferrance, Anthony 13. Peattle, Kevin 14. Francass, Lynn		RFP	AC		SiteOne Custodians	Proposed Custodians	SiteOne Terms	•		
alluded to his former co-worker that employees at Garden Department coatmon with and/or among SiteOne employees at Garden Department plocations SiteOne acquired from 23. Ferama, Alex and when he left the company and started a competing business. (ld.) 29 160 of the Complaint. 29 160 of the Complaint. 29 160 of the Complaint. 20 160 of the Complaint. 21. Francassi, Lynn 4. Sausto, Phil 5. Trama, Alex 4. Peattie, Kevin 5. Trama, Alex 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 4. Peastare, Gerard 4. Peastare, Catalono, Anthony 3. Giordano, Nick 4. Passaro, Gerard 5. Peattie, Kevin 6. Sausto, Phil 6. Saust			¶ 60. Don Caroleo even told this co- worker something to effect of, "I can even put the business in my sister's name," which the co-worker took to mean that Don Caroleo was contemplating possibly establishing a competing business in his sister's name to avoid directly violating the contractual non-compete restrictions he was subject to with		1. Catalono, Anthony	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe				
All documents referencing communication with and/or communication with			· ·		•	•				
among SiteOne employees concerning the allegation in 29 \$\frac{1}{16}\$ for the Complaint. Don Caroleo would "follow him" if and when he left the company and started a competing business. (id.) YES Barry, Theresa 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa Don or Vic or Nick Don or Vic or Nick Don Or Caroleo) AND (sister* OR Vic* OR Dad OR relativ*) Don Or Vic or Nick It Is Is Is Is Is Is It Is		All documents referencing								
concerning the allegation in and when he left the company and started a competing business. (Id.) 1 60 of the Complaint. 2 1 60 of the Complaint. 2 1 60 of the Complaint. 2 1 60 of the Complaint. 3 1/2023 - present 4 1 60 of the Complaint. 4 1 60 of the Complaint. 4 1 60 of the Complaint. 4 1 61 of the Company and started a competing business. (Id.) 5 2 2 6 8 Marx, Theresa 5 2 3 1/2023 - present 5 2 3 1/2023 - present 7 2 1 60 of the Complaint. 1 3 1/2022 to present 1 5 2 2 Catalono, Anthony 3 2 2 Catalono, Anthony 3 3 2 2 Catalono, Anthony 3 3 2 2 Catalono, Anthony 4 2 Catalono, Anthony 5 2 2 Catalono, Anthony 7 3 2 2 3 2 Catalono, Anthony 8 3 2 2 Catalono, Anthony 9 4 2 Catalono, Anthony 9 5 2		communication with and/or	locations SiteOne acquired from		5. Trama, Alex	13.Ferrante, Anthony				
29 ¶ 60 of the Complaint. started a competing business. (Id.) YES 8. Marx, Theresa 16. Marx, Teresa Don or Vic or Nick Dad OR relativ*) present present 1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 2. Catalono, Anthony 8. Justice, Jerry 3. Giordano, Nick 4. Passaro, Gerard 4. Passaro, Gerard 5. Peattie, Kevin 5. Search 10. Korsnowski, Brian information other than the purchase communication with and/or of a piece of land and vague 1. Caroleo, Don 2. Catalono, Anthony 3. Justice, Jerry 4. Passaro, Gerard 5. Peattie, Kevin 5. Peattie, Kevin 11. Francassi, Lynn 12. Hoffman, Brian 16. Marx, Teresa Don or Vic or Nick Dad OR relativ*) present present 1. Black, Doug 2. Catalono, Anthony 8. Justice, Jerry 9. Ketter, Joe 4. Passaro, Gerard 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. However, with no additional information other than the purchase of a piece of land and vague		. ,			, ,					
1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 2. Catalono, Anthony 3. Justice, Jerry 3. Giordano, Nick 4. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 12. Hoffman, Brian 13. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Black, Doug 14. Peattie, Kevin 15. Sausto, Phil 16. Trama, Alex 17. Thistle, Greg 18. Justice, Jerry 19. Catalono, Anthony 19. Thistle, Greg 19. Thistle	00		, ,	VEO	· ·		Dan and Garantial	`		
2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 4. Passaro, Gerard 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 4. Passaro, Gerard 10. Korsnowski, Brian stole* or missing or stole* or missing or stole* or missing or raid or took or gone) and (cabinet or files or paper or and cabinet or files or pape	29	¶ 60 of the Complaint.	started a competing business. (id.)	YES	8. Marx, Theresa	16. Marx, Teresa	Don or vic or Nick	Dad OR relativ*)	present	present
		communication with and/or among SiteOne employees	information other than the purchase of a piece of land and vague statements about potential future		2. Catalono, Anthony 3. Giordano, Nick 4. Passaro, Gerard 5. Peattie, Kevin 6. Sausto, Phil 7. Trama, Alex	2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony	stole* or missing or raid) and (cabinet or files or paper or computer or laptop))	stole* or missing or raid or took or gone) and (cabinet or files or paper or computer or		
concerning the allegation in plans made months earlier, there 8. Thistle, Greg 14. Koch, Taylor and (Don or Nick or laptop) and (Don or Nick o		= =	•				•	, .		
		¶¶ 61 through 64 of the Complaint.	was nothing SiteOne could do at the time.	YES	9. D'Onofrio, Jesse 10. Marx, Theresa	15.D'Onofrio, Jesse 16. Marx, Teresa	Nicholas or Giordano or Caroleo)	Nick or Nicholas or Giordano or Caroleo)	9/1/2022 to present	1/16/2023 to present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
		,,,,			Troposou Guestouluite		100	80	2 ato Harigo
		¶ 62. On January 16, 2023, two							
		SiteOne employees who had worked							
		closely with Giordano at the Coram							
		location for more than 15 years Alex							
		Trauma and Gerard Passaro came							
		into work one morning and noticed							
		Giordano's desktop computer							
		missing from his desk.(Passaro ,r 7;							
		Trauma ,r 7.)							
					1. Black, Doug				
		¶ 63. When questioned about the			2. Catalono, Anthony				
		missing computer, Giordano told			3. Passaro, Gerard				
		them his computer had "crapped			4. Peattie, Kevin				
		out" and that he had thrown it into			5. Sausto, Phil				
		the dumpster located onsite at the			6. Trama, Alex				
		Coram store. (ld.) Passaro found this			7. Thistle, Greg				
		extremely odd; he therefore went			8. Justice, Jerry				
		and looked in the dumpster and the			9.Ketter, Joe		(dumpster or computer		
		computer was not there and the			10. Korsnowski, Brian		or laptop or desktop)		
	All documents referencing	dumpster had not been emptied.		, and the second	11. Francassi, Lynn		and (Don or Nick or		
	communication with and/or	(Passaro ,r 7.) Following this		2. Giordano, Nick	12.Hoffman, Brian	` '	Nicholas or Giordano		
	among SiteOne employees	incident, Giordano began using a		3. Passaro, Gerard	13.Ferrante, Anthony	computer or laptop or	· · · · · · · · · · · · · · · · · · ·		
	ŭ ŭ	different desktop computer from		4. Trama, Alex	14. Koch, Taylor	desktop) and (Don or	•		
	¶¶ 61 through 64 of the	another sales desk. (Passaro ,r8;		5. D'Onofrio, Jesse	15.D'Onofrio, Jesse			9/1/2022 to	1/16/2023 to
30	Complaint.	Trauma ,r 7.)	YES	6. Marx, Theresa	16. Marx, Teresa	Giordano or Caroleo)	Passaro)	present	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
		¶ 68. During the winter's off-season							
		months, the Coram location closes			1. Black, Doug				
		at 4:00 p.m. (Trauma ,i 6.) In the			2. Catalono, Anthony				
		weeks leading up to Giordano's			3. Passaro, Gerard				
		departure from SiteOne in January			4. Peattie, Kevin				
		and February 2023, Trauma			5. Sausto, Phil				
		happened to drive by the Coram			6. Trama, Alex				
		location on multiple occasions after			7. Thistle, Greg				
		hours and after dark (approximately			8. Justice, Jerry				
		6:30 p.m.) and saw Giordano's			9.Ketter, Joe				
		vehicle parked at the store. (Id.)			10. Korsnowski, Brian				
		Although Trauma does not know			11. Francassi, Lynn				
	All documents referencing	what Giordano was doing at the			12.Hoffman, Brian				
	communication with and/or	store after hours, this struck Trauma			13.Ferrante, Anthony				
	among SiteOne employees	as somewhat odd for Giordano to be			14. Koch, Taylor				
	concerning the allegation in	there that late in the day during the			15.D'Onofrio, Jesse	(late or "after	Trama AND (driv* OR	1/1/2023 to	1/1/2023 to
31	¶ 68 of the Complaint.	off-season. (ld.)	YES	1. Trama, Alex	16. Marx, Teresa	dark") and Nick	drove) AND Coram	3/1/2023	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
		¶ 69 On or about January 23, 2023,							
		20-year legacy Garden Department							
		employee Phil Sausto was							
		approached outside of work (at the							
		gym) by a former Garden							
		Department employee. (Sausto ,r3.)							
		This individual told Sausto he spoke							
		with Giordano at the property							
		located on Middle Island Road, and							
		that Giordano told him "we" are							
		opening a nursery business on that							
		property. (Id.) This is the same							
		property identified to SiteOne in							
		November 2022 as having been							
		purchased by Don Caroleo.							
		¶73 Passaro saw Gomez and then-		1. Black, Doug	1. Black, Doug				
		current SiteOne employee Juan		2. Catalono, Anthony	2. Catalono, Anthony				
		Flores-Suarez working at the site.		3. Passaro, Gerard	3. Passaro, Gerard				
		(Passaro ,r 11.) Passaro also saw a		4. Peattie, Kevin	4. Peattie, Kevin				
		vehicle bearing to logo of a SiteOne		5. Sausto, Phil	5. Sausto, Phil				
		customer, Veridian Group, parked at		6. Trama, Alex	6. Trama, Alex				
		the site. (Id.) Passaro took photos of		7. Thistle, Greg	7. Thistle, Greg				
		the site while he was there, which		8. Justice, Jerry	8. Justice, Jerry				
		are attached to his Declaration. (Id.)		9.Ketter, Joe	9.Ketter, Joe				
		This was during normal SiteOne		10. Korsnowski, Brian	10. Korsnowski, Brian				
	All documents referencing	business hours. (ld.) Passaro		11. Koch, Taylor	11. Francassi, Lynn				
	communication with and/or	reported this information to SiteOne		12. D'Onofrio, Jesse	12.Hoffman, Brian				
	among SiteOne employees	via the company's Ethics Hotline on		13. Marx, Teresa	13.Ferrante, Anthony	38 Yaphank or Middle	(Phil OR Sausto) AND		
	concerning the allegation in	January 25, 2023; a copy of his		14. Caroleo, Don	14. Koch, Taylor	Island Road or	(Nick OR Giordano)		
	$\P\P$ 69 through 73 and 75 of	report is attached to his Declaration.		15. Giordano, Nick	15.D'Onofrio, Jesse	horseblock or horse	AND (outside OR work		1/1/2023 to
32	the Complaint.	(ld.)	YES	16. Brisendine, Briley	16. Marx, Teresa	block or narrow way 2	OR gym) AND "we"	N/A	present

			I an a				Later in	l o:: o . b .	
RFP			SiteOne	011 0 0 1 11		00	Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
		¶ 69 On or about January 23, 2023,							
		20-year legacy Garden Department							
		employee Phil Sausto was							
		approached outside of work (at the							
		gym) by a former Garden							
		Department employee. (Sausto ,r3.)							
		This individual told Sausto he spoke							
		with Giordano at the property							
		located on Middle Island Road, and							
		that Giordano told him "we" are							
		opening a nursery business on that							
		property. (Id.) This is the same							
		property identified to SiteOne in							
		November 2022 as having been							
		purchased by Don Caroleo.							
		¶73 Passaro saw Gomez and then-			1. Black, Doug				
		current SiteOne employee Juan			2. Catalono, Anthony				
		Flores-Suarez working at the site.			3. Passaro, Gerard				
		(Passaro ,r 11.) Passaro also saw a			4. Peattie, Kevin				
		vehicle bearing to logo of a SiteOne			5. Sausto, Phil				
		customer, Veridian Group, parked at			6. Trama, Alex				
		the site. (Id.) Passaro took photos of		1. Black, Doug	7. Thistle, Greg				
		the site while he was there, which		2. Brisendine, Briley	8. Justice, Jerry				
		are attached to his Declaration. (Id.)		3. Caroleo, Don	9.Ketter, Joe				
		This was during normal SiteOne		4. Catalono, Anthony	10. Korsnowski, Brian	(new business or			
	All documents referencing	business hours. (ld.) Passaro		5. Giordano, Nick	11. Francassi, Lynn	competing business			
	communication with and/or	reported this information to SiteOne		6. Passaro, Gerard	12.Hoffman, Brian	or new company or	(Don or Nick or		
	among SiteOne employees	via the company's Ethics Hotline on		7. Peattie, Kevin	13.Ferrante, Anthony	competing company)	Nicholas or Giordano		
	concerning the allegation in	January 25, 2023; a copy of his		8. Sausto, Phil	14. Koch, Taylor	and (Don or Nick or	or Caroleo) AND		
	¶¶ 69 through 73 and 75 of	report is attached to his Declaration.		9. Trama, Alex	15.D'Onofrio, Jesse	Nicholas or Giordano	(Gerard OR Passaro)	1/1/2019 to	1/1/2023 to
32	the Complaint.	(ld.)	YES	10. Thistle, Greg	16. Marx, Teresa	or Caroleo)	AND ethics	present	present

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RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
								_	_
		¶75 Shortly after this, two other			1. Black, Doug				
		SiteOne customers with whom			2. Catalono, Anthony				
		Sausto works regularly told him that			3. Passaro, Gerard				
		Don Caroleo and Giordano were			4. Peattie, Kevin				
		starting a new nursery. (Sausto ,r 6.)			5. Sausto, Phil				
		Additionally, one of the employees			6. Trama, Alex				
		Sausto supervises relayed to him			7. Thistle, Greg				
		that at least three SiteOne			8. Justice, Jerry				
		employees (Juan and Jorge Suarez-			9.Ketter, Joe				
		Flores, who are brothers, and			10. Korsnowski, Brian	(Phil OR Sausto) AND	(Phil OR Sausto) AND		
	All documents referencing	Antonio Rio-Garcia) were going to			11. Francassi, Lynn	(Don OR Caroleo OR	(Don OR Caroleo OR		
	communication with and/or	work for Don Caroleo at his new			12.Hoffman, Brian	Nick OR Giordano)	Nick OR Giordano)		
	among SiteOne employees	nursery. (Id.) Those three individuals			13.Ferrante, Anthony	AND (customer* OR	AND (customer* OR		
	concerning the allegation in	left SiteOne within a day or so of			14. Koch, Taylor	Juan OR Jorge OR	Juan OR Jorge OR		
	¶¶ 69 through 73 and 75 of	Giordano's termination (which is			15.D'Onofrio, Jesse	Antonio OR Suarez*	Antonio OR Suarez*		1/1/2023 to
32	the Complaint.	discussed below). (Id.)			16. Marx, Teresa	OR Flores)	OR Flores)		present
	All documents reflecting								
	communications between				1. Black, Doug				
	any SiteOne employee and				2. Catalono, Anthony				
	any Town of Brookhaven				3. Passaro, Gerard				
	employee and/or				4. Peattie, Kevin				
	representative concerning				5. Sausto, Phil				
	the subject matter of the				6. Trama, Alex				
	allegations in ¶¶ 79-87 of	¶79 On February 1, 2023, the Town			7. Thistle, Greg				
	the Complaint.	of Brookhaven filed an Amended			8. Justice, Jerry				
	1	Complaint against The Garden Dept.		1. Catalono, Anthony	9.Ketter, Joe				
	All documents referencing	Corp., Narrow Way 2 LLC, Don		2. Passaro, Gerard	10. Korsnowski, Brian				
	communications with	Caroleo, Vic Caroleo, and other un-		3. Peattie, Kevin	11. Francassi, Lynn				
	and/or among SiteOne	known but affiliated entities and		4. Sausto, Phil	12.Hoffman, Brian				
	employees concerning the	persons in the Suffolk County		5. Trama, Alex	13.Ferrante, Anthony				
	subject matter of the	Supreme Court. A copy of the		6. Thistle, Greg	14. Koch, Taylor	Brookhaven and			
36	allegations in ¶¶ 79-87 of	Amended Complaint is attached as		7. D'Onofrio, Jesse	15.D'Onofrio, Jesse	(attorney or lawyer or	(*@siteone.com AND	1/1/2023 to	1/6/2023 to
37	the Complaint.	Exhibit 5.		8. Marx, Theresa	16. Marx, Teresa	Ormand)	*brookhavenny.gov)	3/1/2023	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
		112					7577715	85	
					1. Black, Doug				
					2. Catalono, Anthony				
					3. Passaro, Gerard				
					4. Peattie, Kevin				
					5. Sausto, Phil				
					6. Trama, Alex				
					7. Thistle, Greg				
	All documents concerning				8. Justice, Jerry				
	Don's earnout for 2020 and				9.Ketter, Joe				
	2021, including SiteOne's				10. Korsnowski, Brian				
	_				11. Francassi, Lynn		(Don OR Caroloo) AND		
	earnout calculations related			1. Black, Doug	12.Hoffman, Brian		(Don OR Caroleo) AND (compensation OR		
	thereto, communications			2. Brisendine, Briley	13. Ferrante, Anthony		•		
	to/from Doug Black,						Payments OR earnout)		
	communications to/from Taylor Koch, and Bissett			3. Caroleo, Don	14. Koch, Taylor 15.D'Onofrio, Jesse		AND (Doug OR Black OR Taylor OR Koch OR	1/1/2010+0	1/1/2019 to
20	Catch Up Expenses.	N/A	YES	4. Justice, Jerry 5. Koch, Taylor	16. Marx, Teresa	payments) and (Don or Caroleo)	*	present	present
36	Catch op Expenses.	IV/A	IES	5. KUCII, Taylui	10. Maix, Telesa	or Caroleo)	bissett)	present	present
					1. Black, Doug				
					2. Catalono, Anthony				
					3. Passaro, Gerard				
					4. Peattie, Kevin				
					5. Sausto, Phil				
	All documents concerning				6. Trama, Alex				
	the separation of Don's			1. Black, Doug	7. Thistle, Greg				
	employment with SiteOne			2. Brisendine, Briley	8. Justice, Jerry				
	and/or its decision to			3. Caroleo, Don	9.Ketter, Joe				
	terminate Don, including all			4. Catalono, Anthony	10. Korsnowski, Brian				
	investigative reports,			5. Giordano, Nick	11. Francassi, Lynn				
	documents compiled by			6. Ketter, Joe	12.Hoffman, Brian	(Terminat* or fire or			
	outside independent			7. Thistle, Greg	13.Ferrante, Anthony	let go or last day) and			
	investigators, and			8. Justice, Jerry	14. Koch, Taylor	(Don or Nick or	(Terminat* or fire or let		
	submissions to decision-			9. Kersnowski, Brian	15.D'Onofrio, Jesse	Nicholas or Giordano	•	9/1/2022 to	9/1/2022 to
39		N/A	YES	10. Koch, Taylor	16. Marx, Teresa	or Caroleo)		present	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
					1. Black, Doug				
					2. Catalono, Anthony				
					3. Passaro, Gerard				
					4. Peattie, Kevin				
					5. Sausto, Phil				
					6. Trama, Alex				
				1. Black, Doug	7. Thistle, Greg				
				2. Brisendine, Briley	8. Justice, Jerry				
				3. Caroleo, Don	9.Ketter, Joe				
				4. Catalono, Anthony	10. Korsnowski, Brian				
				5. Giordano, Nick	11. Francassi, Lynn				
				6. Ketter, Joe	12.Hoffman, Brian	(Terminat* or fire or			
	All documents subsequent			7. Thistle, Greg	13.Ferrante, Anthony	let go or last day) and			
	to the decision to terminate			8. Justice, Jerry	14. Koch, Taylor	(Don or Nick or			
	Don concerning Don			9. Kersnowski, Brian	15.D'Onofrio, Jesse	Nicholas or Giordano	(Laura OR Shartle) and	9/1/2022 to	9/1/2022 to
41	to/from Laura Shartle.	N/A	NO	10. Koch, Taylor	16. Marx, Teresa	or Caroleo)	(Don OR Caroleo)	present	present
					1. Black, Doug				
					2. Catalono, Anthony				
					3. Passaro, Gerard				
					4. Peattie, Kevin				
					5. Sausto, Phil				
					6. Trama, Alex				
				1. Black, Doug	7. Thistle, Greg				
				2. Brisendine, Briley	8. Justice, Jerry				
				3. Caroleo, Don	9.Ketter, Joe				
				4. Catalono, Anthony	10. Korsnowski, Brian				
				5. Giordano, Nick	11. Francassi, Lynn				
				6. Ketter, Joe	12.Hoffman, Brian	(Terminat* or fire or			
	All documents subsequent			7. Thistle, Greg	13.Ferrante, Anthony	let go or last day) and			
	to the decision to terminate			8. Justice, Jerry	14. Koch, Taylor	(Don or Nick or			
	Don concerning Don			9. Kersnowski, Brian	15.D'Onofrio, Jesse	Nicholas or Giordano	(Joe OR Ketter) and	9/1/2022 to	9/1/2022 to
42	to/from Joe Ketter.	N/A	YES	10. Koch, Taylor	16. Marx, Teresa	or Caroleo)	(Don OR Caroleo)	present	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
	All documents subsequent to the decision to terminate Don concerning Don			1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12.Hoffman, Brian 13.Ferrante, Anthony 14. Koch, Taylor	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano		9/1/2022 to	9/1/2022 to
	to the decision to terminate			8. Justice, Jerry	14. Koch, Taylor	(Don or Nick or			
	· ·								
43	to/from Doug Black.	N/A	YES	10. Koch, Taylor	16. Marx, Teresa	or Caroleo)	(Don OR Caroleo)	present	present
	All documents subsequent			1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg		(Terminat* or fire or let go or last day) and			
	to the decision to terminate			8. Justice, Jerry	14. Koch, Taylor	(Don or Nick or			
	Don concerning Don			9. Kersnowski, Brian		Nicholas or Giordano	(Brian OR Kersnowski)	9/1/2022 to	9/1/2022 to
44	to/from Brian Kersnowski.	N/A	YES	10. Koch, Taylor	16. Marx, Teresa	or Caroleo)	and (Don OR Caroleo)	present	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
	All documents subsequent to the decision to terminate Don concerning Don			1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano		9/1/2022 to	9/1/2022 to
	to the decision to terminate			8. Justice, Jerry	14. Koch, Taylor	(Don or Nick or			
45	Don concerning Don to/from Jerry Justice.	N/A	YES	9. Kersnowski, Brian 10. Koch, Taylor	15.D'Onofrio, Jesse 16. Marx, Teresa	Nicholas or Giordano or Caroleo)	(Jerry OR Justice) and (Don OR Caroleo)	9/1/2022 to present	9/1/2022 to present
	All documents subsequent to the decision to terminate			1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor	(Terminat* or fire or let go or last day) and (Don or Nick or			
40	Don concerning Don	N/A		9. Kersnowski, Brian	15.D'Onofrio, Jesse	Nicholas or Giordano	(Anthony OR Catalano)		9/1/2022 to
46	to/from Anthony Catalano.	N/A	YES	10. Koch, Taylor	16. Marx, Teresa	or Caroleo)	and (Don OR Caroleo)	present	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
	All documents subsequent to the decision to terminate Don concerning Don			1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12.Hoffman, Brian 13.Ferrante, Anthony 14. Koch, Taylor	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano		9/1/2022 to	9/1/2022 to
	· ·			*			,		
47	to/from Greg Thistle.	N/A	YES	10. Koch, Taylor	16. Marx, Teresa	or Caroleo)	(Don OR Caroleo)	present	present
	All documents subsequent			1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg	13.Ferrante, Anthony	(Terminat* or fire or let go or last day) and			
	to the decision to terminate Don concerning Don			8. Justice, Jerry 9. Kersnowski, Brian	14. Koch, Taylor 15.D'Onofrio, Jesse	(Don or Nick or Nicholas or Giordano	(Kevin OR Peattie) and	9/1/2022 to	9/1/2022 to
48	to/from Kevin Peattie.	N/A	YES	10. Koch, Taylor	· ·		(Don OR Caroleo)	present	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
	All documents subsequent to the decision to terminate Don concerning Don			1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12.Hoffman, Brian 13.Ferrante, Anthony 14. Koch, Taylor 15.D'Onofrio, Jesse	(Terminat* or fire or let go or last day) and (Don or Nick or	(Sean OR Kramer) and		9/1/2022 to
						1,	(Sean OR Kramer) and	9/1/2022 to	9/1/2022 to
49	ŭ	N/A	YES	10. Koch, Taylor	16. Marx, Teresa	or Caroleo)	(Don OR Caroleo)	present	present
	All documents subsequent to the decision to terminate			1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12.Hoffman, Brian 13.Ferrante, Anthony 14. Koch, Taylor	(Terminat* or fire or let go or last day) and (Don or Nick or			
50	Don concerning Don to/from Lynn Francassi.	N/A		9. Kersnowski, Brian 10. Koch, Taylor	15.D'Onofrio, Jesse 16. Marx, Teresa	Nicholas or Giordano or Caroleo)		9/1/2022 to present	9/1/2022 to present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
					1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil				
				1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick	6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn				
				6. Ketter, Joe	12.Hoffman, Brian	(Terminat* or fire or			ļ
				7. Thistle, Greg	13.Ferrante, Anthony		(Nick OR Nicholas OR		
	All documents concerning			8. Justice, Jerry	14. Koch, Taylor	(Don or Nick or	OR Giordano) AND	0/4/0000 +-	40/40/0000 +-
E 1	the decision to terminate Nick.	N/A	YES	9. Kersnowski, Brian 10. Koch, Taylor	15.D'Onofrio, Jesse 16. Marx, Teresa	or Caroleo)	(term* OR fire OR "let go" OR equity)	9/1/2022 to	10/19/2022 to
51	INICK.	IN/A	IES	10. KOCII, Tayloi	16. Marx, refesa	or Caroleo)	go OR equity)	present	present
	All documents reflecting communications to/from SiteOne employee Alex Trauma concerning the	¶89 Apparently sensing his termination was imminent, on February 15 or 16, 2023, Giordano told SiteOne employee Alex Trauma not to come into work on February 20. (Trauma ,r 5.) He did not give Trauma a specific reason; since Trauma reported to Giordano at the time, Trauma did not go into work February 20. (Id.) Upon information and belief, Giordano also told other			1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12.Hoffman, Brian 13.Ferrante, Anthony		(Nick OR Nicholas OR Giordano) AND (Alex OR Trama) AND		
	subject matter of the	SiteOne employees not to come to			14. Koch, Taylor		("come in" OR "go in"		
	allegations contained in ¶¶	work in or around this time, for no	NO		15.D'Onofrio, Jesse	.	OR "go to" OR "come	N1/A	2/1/2023 to
52	89-90 of the Complaint.	reason whatsoever.	NO	N/A	16. Marx, Teresa	N/A	to") AND work	N/A	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
					1. Black, Doug				
					2. Catalono, Anthony				
					3. Passaro, Gerard				
					4. Peattie, Kevin				
					5. Sausto, Phil				
					6. Trama, Alex				
		¶90 Further, shortly before			7. Thistle, Greg				
		Giordano's last day with SiteOne, he			8. Justice, Jerry				
		also asked Trauma whether Trauma			9.Ketter, Joe				
	All documents reflecting	would "follow him" when Giordano			10. Korsnowski, Brian				
	communications to/from	left. (Trauma ,r 5.) Based on the			11. Francassi, Lynn				
	SiteOne employee Alex	context of the discussion, Trauma			12.Hoffman, Brian				
	Trauma concerning the	assumed Giordano was going to			13.Ferrante, Anthony		(Nick OR Nicholas OR		
	subject matter of the	work for or start a business to			14. Koch, Taylor		Giordano) AND (Alex		
	allegations contained in ¶¶	compete with SiteOne and wanted			15.D'Onofrio, Jesse		OR Trama) AND		9/1/2022 to
52	89-90 of the Complaint.	Trauma to come work with him. (ld.)	NO	N/A	16. Marx, Teresa	N/A	(follow OR join)	N/A	present
					1. Black, Doug				
					2. Catalono, Anthony				
					3. Passaro, Gerard				
					4. Peattie, Kevin				
					5. Sausto, Phil				
					6. Trama, Alex				
				1. Black, Doug	7. Thistle, Greg				
				2. Brisendine, Briley	8. Justice, Jerry				
				3. Caroleo, Don	9.Ketter, Joe				
	All documents reflecting			4. Catalono, Anthony	10. Korsnowski, Brian		(Joe OR Ketter OR Greg		
	communications by any			5. Giordano, Nick	11. Francassi, Lynn		OR Thistle OR Anthony		
	SiteOne employee with or			6. Ketter, Joe	12.Hoffman, Brian	(Terminat* or fire or	OR Catalano) and		
	involving Joe Ketter, Greg			7. Thistle, Greg	13.Ferrante, Anthony	,,	(Nick OR Nicholas OR		
	Thistle and/or Anthony			8. Justice, Jerry	14. Koch, Taylor	(Don or Nick or	Giordano) AND (term*		
_	Catalano concerning the			9. Kersnowski, Brian	15.D'Onofrio, Jesse		_	9/1/2022 to	10/19/2022 to
54	decision to terminate Nick.		YES	10. Koch, Taylor	16. Marx, Teresa	or Caroleo)	equity)	present	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
		¶94 At SiteOne's Coram location							
		there is a physical file cabinet							
		located in the sales area. (Passaro ,r							
		12.) The top drawer of this file							
		cabinet contained hard copies of							
		extensive bidding and contract							
		information for dozens of customers							
		and projects going back							
		approximately three years (if not			1. Black, Doug				
	All documents reflecting	longer). (Id.) These documents			2. Catalono, Anthony				
	communications by any	contained pricing, contract			3. Passaro, Gerard				
	SiteOne employee with or	expiration dates, detailed project			4. Peattie, Kevin				
	involving Gerard Passaro	information, and other sensitive			5. Sausto, Phil				
	concerning the subject of	business information. (ld.) There			6. Trama, Alex				
	the allegation contained in	were hundreds if not thousands of		1. Caroleo, Don	7. Thistle, Greg				
	¶¶94-103 of the Complaint.	pages of documents in the top		2. Catalono, Anthony	8. Justice, Jerry				
		drawer of the cabinet. (Id.) Although		3. Giordano, Nick	9.Ketter, Joe	(theft or steal* or			
	All documents reflecting	SiteOne has additional copies of		4. Passaro, Gerard	10. Korsnowski, Brian	stole* or missing or			
	communications by any	some of these documents		5. Peattie, Kevin	11. Francassi, Lynn	raid) and (cabinet or			
	SiteOne employee with or	elsewhere, there is no list of what		6. Sausto, Phil	12.Hoffman, Brian	files or paper or			
	involving Greg Thistle	was stored in the file cabinet and		7. Trama, Alex	13.Ferrante, Anthony	computer or laptop)	(Gerard OR Passaro)		
	concerning the subject of	thus no way to inventory or		8. Thistle, Greg	14. Koch, Taylor	and (Don or Nick or	AND (file OR cabinet	9/1/2022 to	
	•	otherwise specifically identify the		9. D'Onofrio, Jesse	15.D'Onofrio, Jesse	Nicholas or Giordano	OR documents OR	present	2/1/2023 to
57	$\P\P$ 94-103 of the Complaint.	documents it con-tained. (ld.)	YES	10. Marx, Theresa	16. Marx, Teresa	or Caroleo)	pages OR paper)		present

		Case 2:23-cv-02084-G	RB-SIL		89-8 2899
RFP			SiteOne		
No.	RFP	AC	Search	SiteOne Custodians	Proposed
		¶95 The morning after Giordano was			
		fired-February 21, 2023 -Passaro			
		came into work and found that all			
		the file cabinet's documents had			
		been removed. (Passaro ,r 13.)			1. Black, D
		Addition-ally, Passaro's company-			2. Catalono
		issued iPhone was at the Coram			3. Passaro

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
		¶95 The morning after Giordano was							
		fired-February 21, 2023 -Passaro							
		came into work and found that all							
		the file cabinet's documents had							
		been removed. (Passaro ,r 13.)			1. Black, Doug				
		Addition-ally, Passaro's company-			2. Catalono, Anthony				
		issued iPhone was at the Coram			3. Passaro, Gerard				
		location the night Giordano was			4. Peattie, Kevin				
		terminated, as was Passaro's regular			5. Sausto, Phil				
		practice. (Passaro ,r20.) The			6. Trama, Alex		1.		
		morning after Giordano's			7. Thistle, Greg		(Gerard OR Passaro)		
		termination, customer contact			8. Justice, Jerry		AND phone AND Notes		
		information had been deleted and			9.Ketter, Joe				
		modified in the phone, and			10. Korsnowski, Brian		2.		
		important business information		1. Caroleo, Don	11. Francassi, Lynn		(Gerard OR Passaro)		
		Passaro stored in the "Notes" app on		2. Giordano, Nick	12.Hoffman, Brian	(dumpster or	AND (pric* OR		
		the phone had been deleted. (Id.)		3. Passaro, Gerard	13.Ferrante, Anthony	computer or laptop or	contract* OR project*		
		Giordano had the passcode to		4. Trama, Alex	14. Koch, Taylor	desktop) and (Don or	OR sensitive OR		
56		Passaro's company-issued phone.		5. D'Onofrio, Jesse	15.D'Onofrio, Jesse	Nick or Nicholas or	confid* OR business	9/1/2022 to	2/20/2023 to
57		(ld.)	YES	6. Marx, Theresa	16. Marx, Teresa	Giordano or Caroleo)	OR propriet*)	present	present
					1. Black, Doug				
					2. Catalono, Anthony				
					3. Passaro, Gerard				
					4. Peattie, Kevin				
		¶96 SiteOne's Coram location has a			5. Sausto, Phil				
		security camera system installed.			6. Trama, Alex				
		(Passaro ,r 17; Thistle ,r 7.)			7. Thistle, Greg				
		Approximately one week after			8. Justice, Jerry				
		Giordano was fired, Passaro			9.Ketter, Joe				
		checked the closet where the			10. Korsnowski, Brian				
		monitor and DVR recording system			11. Francassi, Lynn				
		for the security camera system was			12.Hoffman, Brian		(0 1005		
		located. (Id.) It was discovered that			13.Ferrante, Anthony		(Gerard OR Passaro)		
		both the monitor and DVR recorder			14. Koch, Taylor	.	AND (security OR	0.44.00055	0.400.400.55
56		were missing. (ld.) These items have			15.D'Onofrio, Jesse	N/A		9/1/2022 to	2/20/2023 to
57		not found. (ld.)	N/A	N/A	16. Marx, Teresa		record* OR monitor)	present	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
		¶97 Worse yet, the security camera			1. Black, Doug				
		system was set up to be remotely			2. Catalono, Anthony				
		monitored by Giordano and Don			3. Passaro, Gerard				
		Caroleo on their personal			4. Peattie, Kevin				
		smartphones. (Passaro ,i 18; Thistle			5. Sausto, Phil				
		,i 7.) The vendor who installed the			6. Trama, Alex				
		security camera system was called			7. Thistle, Greg				
		to the property and explained that			8. Justice, Jerry				
		the only way to recover footage from			9.Ketter, Joe				
		the system is to locate the missing			10. Korsnowski, Brian				
		DVR recorder. (Thistle, 7.) The			11. Francassi, Lynn				
		vendor further explained that it was			12.Hoffman, Brian				
		entirely possible that someone (i.e.,			13.Ferrante, Anthony		(recover AND footage		
		Giordano and Don Car- oleo) were			14. Koch, Taylor		AND camera AND		
56		still monitoring and/or recording the		A1/A	15.D'Onofrio, Jesse		remote* AND	9/1/2022 to	2/20/2023 to
57		cameras remotely. (ld.)	N/A	N/A	16. Marx, Teresa	N/A	monitor*)	present	present
					1. Black, Doug				
					2. Catalono, Anthony				
		¶98 After his conversation with the			3. Passaro, Gerard				
		security camera vendor, Thistle			4. Peattie, Kevin				
		walked the Coram property and			5. Sausto, Phil				
		identified approximately 60 to 70			6. Trama, Alex				
		cameras installed throughout the			7. Thistle, Greg				
		property, both inside and outside of			8. Justice, Jerry				
		the main building. (Thistle ,i 7.) While			9.Ketter, Joe				
		employees reported that some of			10. Korsnowski, Brian				
		the cameras were fake, there is no			11. Francassi, Lynn				
		way to identify which ones are/were			12.Hoffman, Brian				
		currently functioning and/or are			13.Ferrante, Anthony				
		continuing to provide a live feed to			14. Koch, Taylor				
56		Don Caroleo and Giordano. (Thistle ,i			15.D'Onofrio, Jesse		(Greg OR Thistle) AND	9/1/2022 to	2/20/2023 to
57		7.)	N/A	N/A	16. Marx, Teresa	N/A	(camera* OR video)	present	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
					1. Black, Doug				
					2. Catalono, Anthony				
					3. Passaro, Gerard				
					4. Peattie, Kevin				
					5. Sausto, Phil				
					6. Trama, Alex				
					7. Thistle, Greg				
					8. Justice, Jerry				
					9.Ketter, Joe				
		¶100 To the extent Don Caroleo			10. Korsnowski, Brian				
		and/or Giordano is attempting to			11. Francassi, Lynn				
		and/or currently accessing or			12.Hoffman, Brian				
		recording the footage from these			13.Ferrante, Anthony		(Don OR Caroleo OR		
		video cameras, they do not have			14. Koch, Taylor		Nick OR Giordano)		
56		authority from Site- One to do so.			15.D'Onofrio, Jesse		AND (video OR	9/1/2022 to	2/20/2023 to
57		(ld.)	N/A	N/A	16. Marx. Teresa	N/A	camera)	present	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
		¶101 On March 6, 2023, it was							
		discovered that the computer used							
		by bookkeeper Rose Casper was							
		missing. (Passaro, 15.) Casper was							
		last seen in the Coram office in early							
		February 2023. (ld.) When she came							
		into the office, Casper would work in							
		a small office at the Coram location.			1. Black, Doug				
		(Id.) That office was typically locked			2. Catalono, Anthony				
		when not in use. (Id.) On March 6,			3. Passaro, Gerard				
		2023, a new employee began			4. Peattie, Kevin				
		working for SiteOne, and SiteOne			5. Sausto, Phil				
		planned to repurpose Casper's			6. Trama, Alex				
		computer for the new employee.			7. Thistle, Greg				
		(Id.) However, SiteOne discovered			8. Justice, Jerry				
		that the computer was not in the			9.Ketter, Joe				
		office where it was last seen, and it			10. Korsnowski, Brian				
		has not since been recovered. (ld.)			11. Francassi, Lynn				
		Although it is unknown what			12.Hoffman, Brian				
		information was stored on this			13.Ferrante, Anthony		(Rose OR Casper OR		
		device, the timing suggests this was			14. Koch, Taylor		bookkeeper) AND		
56		another item stolen by Giordano in			15.D'Onofrio, Jesse			9/1/2022 to	2/20/2023 to
57		concert with Don and Vic Caroleo.	N/A	N/A	16. Marx, Teresa	N/A	OR desktop)	present	present

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.	RFP	AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
		-						. 0	
					1. Black, Doug				
					2. Catalono, Anthony				
					3. Passaro, Gerard				
					4. Peattie, Kevin				
					5. Sausto, Phil				
					6. Trama, Alex				
					7. Thistle, Greg				
					8. Justice, Jerry				
	All documents containing or				9.Ketter, Joe				
	referring to				10. Korsnowski, Brian				
	communications to SiteOne				11. Francassi, Lynn				
	employees advising that			1. Catalono, Anthony	12.Hoffman, Brian		"trade secret" OR		
	certain information or			2. Passaro, Gerard	13.Ferrante, Anthony		proprietary OR ("as		
	documents shall be treated			3. Peattie, Kevin	14. Koch, Taylor		confidential" OR "is		
	as confidential, proprietary,			4. Sausto, Phil	15.D'Onofrio, Jesse		confidential" OR "are	1/1/2020 to	1/1/2020 to
65	or a trade secret of SiteOne.	N/A	YES	5. Trama, Alex	16. Marx, Teresa	trade secret	confidential")	present	present
					1. Black, Doug				
					2. Catalono, Anthony				
					3. Passaro, Gerard				
					4. Peattie, Kevin				
					5. Sausto, Phil				
					6. Trama, Alex				
					7. Thistle, Greg				
					8. Justice, Jerry				
					9.Ketter, Joe				
					10. Korsnowski, Brian				
	All documents concerning				11. Francassi, Lynn				
	SiteOne's ability to access				12.Hoffman, Brian				
	or restrict access to the				13.Ferrante, Anthony	(heidrich w/2			
	website address:				14. Koch, Taylor	frederick or lc			
	http://www.lccsny.com/gdw		l	1. Caroleo, Don	15.D'Onofrio, Jesse	consulting or	website AND (restrict		
92	eb/SalesMobilev2.aspx.	N/A	YES	2. Giordano, Nick	16. Marx, Teresa	lccsny.com)	OR access)	1/1/2019	1/1/2019

RFP			SiteOne				Additional Proposed	SiteOne Date	Proposed
No.		AC	Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Terms	Range	Date Range
					1. Black, Doug				
					2. Catalono, Anthony				
					3. Passaro, Gerard				
					4. Peattie, Kevin				
					5. Sausto, Phil				
					6. Trama, Alex				
					7. Thistle, Greg				
					8. Justice, Jerry				
	As to each Defendant, all				9.Ketter, Joe				
	documents and				10. Korsnowski, Brian				
	communications supporting				11. Francassi, Lynn				
	Plaintiff's claims that				12.Hoffman, Brian				
	Defendants entered into an				13.Ferrante, Anthony				
	agreement in furtherance of				14. Koch, Taylor		conspiracy AND (don		
	an alleged civil conspiracy				15.D'Onofrio, Jesse		or caroleo or Nick or		
102	against SiteOne.	N/A	NO	N/A	16. Marx, Teresa	N/A	Nicholas or Giordano)	N/A	9/1/2022